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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

DAVID V. AMES,

Plaintiff,

v.

CORPORATION OF THE PRESIDENT OF THE
CHURCH OF JESUS CHRIST OF THE LATTER-
DAY SAINTS, a Utah corporation sole, a/k/a the
"MORMON CHURCH," and WILLIAM SCOTT
HANSON, individually,

Defendants.

Civil Action No 06-CV-3441
(WJM) (MF)

**DECLARATION OF WILLIAM J. MARTIN RE PLAINTIFF'S RESPONSE TO
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

I, William J. Martin declare that I am one of the counsel for plaintiff in this matter and I make this declaration based on my own personal knowledge.

1. Attached as Exhibit 1 is the City of Orem Public Safety Department *Incident Report* of November 18, 1986.

2. Attached as Exhibit 2 is the Amended Information, *State of Utah v. William Scott Hanson*, Criminal No. 860005481, May 19, 1986.

3. Attached as Exhibit 3 is the Statement by Defendant in Advance of Pleading Guilty, dated October 8, 1987, *State of Utah v. William Scott Hanson*.

4. Attached as Exhibit 4 is the Judgment and Order of Probation, *State of Utah v. William Scott Hanson*.

5. Attached as Exhibit 5 is a May 7, 1987 Ruling, *State of Utah v. William Scott Hanson*.

6. Attached as Exhibit 6 is the Church Handbook of Instruction.

7. Attached as Exhibit 7 is the General Handbook of Instruction, 1985.

8. Attached as Exhibit 8 are relevant pages from the transcript of the Deposition of Robert O. Hansen of October 9, 2007.

9. Attached as Exhibit 9 are relevant pages from the transcript of the Deposition of Leland Howell of February 21, 2008.

10. Attached as Exhibit 10 is a publication from the Mormon Church entitled Child Abuse: Help for the Ecclesiastical Leaders.

11. Attached as Exhibit 11 is an article from the July 1984 *Ensign*, 30 entitled, *I have a Question: What are the best ways to fight the horrors of child pornography and the sexual abuse of children?*.

12. Attached as Exhibit 12 is a report by Robert J. Howell, Ph.D., dated May 5, 1987 regarding his examination of Scott William Hanson.

13. Attached as Exhibit 13 is a report by Peter Heinbecker, M.D., J.D., regarding his examination of Scott Hanson.

14. Attached as Exhibit 14 are relevant pages from the transcript of the Deposition of Kami Hanson of October 10, 2007.

15. Attached hereto as Exhibit 15 is a report by Eli H. Newberger, M.D., Ames v. Mormon Church: Violations of Congregate Care for Children dated March 27, 2008.

16. Attached hereto as Exhibit 16 are articles by Dr. Martha Beck, Ph.D., *Adult Survivors of Childhood Sexual Abuse: The Case of Mormon Women and Betrayal of Sacred Trust "Sanctuary Trauma" in Sexual Abuse Survivors*.

17. Attached hereto as Exhibit 17 is a *Report on Sexual Abuse in Mormonism*, Dr. Martha Beck, Ph.D., dated March 27, 2008.

18. Attached hereto as Exhibit 18 are the relevant pages from the transcript of the Deposition of Chris G. Ames taken October 11, 2007.

19. Attached hereto as Exhibit 19 are the relevant pages from the transcript of the Deposition of Hans Erik Wallin taken February 7, 2008.

20. Attached hereto as Exhibit 20 are the relevant pages from the transcript of the Deposition of William Scott Hanson taken June 22, 2007.

21. Attached hereto as Exhibit 21 are the relevant pages from the transcript of the Deposition of Kathleen Ames taken October 30, 2007.

22. Attached hereto as Exhibit 22 are the relevant pages from the transcript of the Deposition of David V. Ames taken March 4, 2008.

23. Attached hereto as Exhibit 23 is David Ames July 2000 Statement to Police.

24. Attached hereto as Exhibit 24 are relevant pages from the transcript of the Deposition of James Braby taken October 24, 2007.

25. Attached hereto as Exhibit 25 is the Police Report, Sentencing Transcript, Indictment and Amended Indictment, Waukesha County, Wisconsin.

26. Attached hereto as Exhibit 26 are relevant pages from the transcript of the Deposition of Patrick Boley, taken February 25, 2008.

27. Attached hereto as Exhibit 27 are relevant pages from the transcript of the Deposition of Martin R. Davis taken February 4, 2008.

28. Attached hereto are portions of the Encyclopedia of Mormonism.

Dated this 21st day of April 2008 in Westmont, New Jersey.

MARTIN, GUNN & MARTIN, P.A.
Attorneys for Plaintiff David Ames

BY: /s/ William J. Martin
WILLIAM J. MARTIN